

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,)	
)	Adv. Pro. No. 08-01789
)	
Plaintiff-Applicant,)	SIPA LIQUIDATION
)	
v.)	(Substantively Consolidated)
)	
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,)	
)	
)	
Defendant.)	
)	
In re:)	
)	
BERNARD L. MADOFF,)	
)	
Debtor.)	
)	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,)	
)	
)	
Plaintiff,)	Adv. Pro. No. 11-02733 (CGM)
)	
v.)	
)	
NAIDOT & CO. and BESSEMER TRUST COMPANY,)	
)	
)	
Defendant.)	

**MOTION TO WITHDRAW AS COUNSEL AND REQUEST TO BE
REMOVED FROM ELECTRONIC NOTICE AND SERVICE LIST**

Pursuant to Local Rule 2090-1(e), Heather Lamberg of Winston & Strawn LLP (“Movant”) hereby respectfully moves for an order withdrawing as counsel of record for Defendants Naidot & Co. and Bessemer Trust Company (hereafter, “Defendants”). Movant further requests that her name be removed from all notice and service lists for this matter. In support of this Motion, Movant states:

1. On January 12, 2011, I, as Heather Lamberg Kafele of Shearman & Sterling LLP, was granted admission to practice *pro hac vice* to represent Naidot & Co. in the above-captioned action.

2. On April 12, 2017, I filed a Notice of Appearance in Adversary Proceeding , Request for Services of Notices and Paper, and Change of Law Firm on behalf of Defendant Naidot & Co. to notify the Court of my relocation from Shearman & Sterling LLP to Winston & Strawn LLP and to assert Winston & Strawn LLP's appearance for Naidot & Co. in the above-captioned action.

3. On August 5, 2022, the Special Counsel for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff filed an Amended Complaint against Bessemer Trust Company and Naidot & Co. ("Defendants") in the above-captioned action.

4. On October 20, 2022, I, as Heather Lamberg of Winston & Strawn LLP, filed on behalf of Defendants Bessemer Trust Company and Naidot & Co. the Motion to Dismiss Adversary Proceeding as to the Amended Complaint in the above-captioned action

5. On January 18, 2023, James V. Masella III of Patterson Belknap Webb & Tyler LLP filed on behalf of Defendants Bessemer Trust Company and Naidot & Co. the Notice of Appearance in Adversary Proceeding and Request for Service of Papers filed in this proceeding, and on January 19, 2023, filed on behalf of Defendants Bessemer Trust Company and Naidot & Co. the Reply to Motion in Further Support of Defendants' Joint Motion to Dismiss in the above-captioned action.

6. Defendants Bessemer Trust Company and Naidot & Co. have determined to be represented solely by Patterson Belknap Webb & Tyler LLP in the above-captioned action.

7. Therefore, I hereby request that I and Winston & Strawn LLP be granted permission to withdraw from the representation of Defendants Bessemer Trust Company and Naidot & Co. (“Defendants”) and to be removed from all notice and service lists for the above-captioned action. Defendants will continue to be represented by James V. Masella III and Patterson Belknap Webb & Tyler LLP and there will therefore be no disruption to the court's calendar or the representation of Defendants in the above-captioned action.

8. There are no pending applications or other matters before the Court that would be affected by my and Winston & Strawn LLP’s withdrawal from representation in the above-captioned action.

Dated: February 13, 2023

Respectfully submitted,

By: /s/ Heather Lamberg
Heather Lamberg
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*Counsel for Defendants Bessemer Trust
Company and Naidot & Co.*